

## **Comment 1 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: James

Last Name: Miller

Email Address: jrussmiller@yahoo.com

Affiliation:

Subject: Landfill Diversion

Comment:

The landfill diversion rules of AB 939 need to be modified to allow thermal conversion of waste materials into fuels and chemicals. Millions of tons each year are buried that many technologies could convert into gasoline, diesel, jet fuel, solid fuel, or specialty chemical. This is generally prohibited by the uncertainties of obtaining a Solid Waste Facility Permit from the CIWMB.

Further the CIWMB should offer incentives for developers to build projects close to MRF's and landfills to intercept material and make it into fuel. This would reduce truck traffic, create renewable fuels, and reduce diesel pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 17:12:04

No Duplicates.

## **Comment 2 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: arthur

Last Name: boone

Email Address: arboone3@yahoo.com

Affiliation: owner, total recycling associates

Subject: failure to advance recycling.

Comment:

I was present in Sacramento on July 17th but compelled to leave before my number was called.

It was heartening to hear that California has at present 32,000 solar rooftop installations and plans a million new solar roofs; if I were in the solar equipment installation business, I would be heartened by a 1700% increase in my business mandated by state action.

Unfortunately, I'm in the waste reduction and recycling business and, despite extensive documentation over the last fifteen years that recycling abandoned consumer products reduces energy consumption in basic industries by a large amount (the national figure is equal to 21% of all coal-fired power plant emissions), CARB staff has given the recycling industry not one single crumb in its draft scoping plan. Whether intimidated by the CIWMB's inability to act or influenced by the failure of the IPCC to take industrial emissions as amenable to major reductions through existing technologies (recycling is an old, simple, and time-tested technology) or even possibly ignorant of the effects of recycling on industrial emissions (a matter well chronicled in John Davis' presentations to the CIWMB in May, 2007 and raised again at the CIWMB meeting with interested parties in January 2008 and never reconvened), CARB staff has given us nothing. That's a mistake.

Arthur R. Boone

owner

Total Recycling Associates, Oakland.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 07:57:01

No Duplicates.

### **Comment 3 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: John

Last Name: Holtzclaw

Email Address: john.holtzclaw@sierraclub.org

Affiliation:

Subject: polluter pays

Comment:

.           Make polluters pay for their emissions of greenhouse gases, using the resulting revenues to promote clean energy and aid low-income consumers. Limit sharply and verify any offsets. Do not link our program to any states with weaker emission standards.

.           Promote and enable Community Choice Electricity Aggregation (CCA), which lets communities pool their buying power to generate clean power.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 17:51:41

No Duplicates.

**Comment 4 for Industry Comments for the GHG Scoping Plan (sp-industry-  
ws) - 1st Workshop.**

First Name: Kathleen

Last Name: Weber

Email Address: sierra\_dogg@yahoo.com

Affiliation: Sierra Club

Subject: making polluters pay for their greenhouse gas emissions

Comment:

I support the Sierra Club's position that greenhouse gas emissions by industries (including agriculture) should be paid for by these industries, with the money going to developing cleaner energy sources. Limit offsets sharply and verify them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 13:48:03

No Duplicates.

**Comment 5 for Industry Comments for the GHG Scoping Plan (sp-industry-  
ws) - 1st Workshop.**

First Name: Kathleen

Last Name: Weber

Email Address: sierra\_dogg@yahoo.com

Affiliation: Sierra Club

Subject: strengthen industry production of ZEVs by 2014

Comment:

Measure AB32 mandates that by 2014, the auto industry must produce 7500 Zero Emission Vehicles. This figure should be raised to 100,000 or more. The American auto industry has lagged behind reality for far too many years and does not need any more excuses made for them to continue in this can't-do mode.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 13:54:51

No Duplicates.

## **Comment 6 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Carol

Last Name: Singleton

Email Address: quetzal4@charter.net

Affiliation:

Subject: Make Polluters pay for their emissions

Comment:

Please make polluters pay fo their emissions of greenhouse gases, using the resulting revenues to promote clean energy and aid low-income consumers. Please limit sharply and actively/independently verify any offsets. Do not link the program to any states with weaker emission standards.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 19:31:55

No Duplicates.

## **Comment 7 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Roberto

Last Name: Amadei

Email Address: ramadeil@alice.it

Affiliation: Chemical & Energy Development srl

Subject: AB 32

Comment:

We are pleased to attach the description of a measure to Well-To-Wheels reduce Greenhouse Gas emissions (the report "An economic and environmental gasoline"), in its turn containing two enclosures.

The measure, that can be carried out now, complies with the maximum benefits for California, as defined by the AB 32 bill.

In fact

- the measure reduces considerably the GHG emissions both in the gasoline production and consumption segments,
- this reduction does not happen at cost but with a (huge) profit per ton of GHG reduced and
- the measure also reduces all types of the toxic or harmful emissions, consequently also improving public health and environment.

The above report considers and figures up the profit carried out by the measure. We observe yet that this profit is a direct, cash one. The report does not consider, it neglects, the economic value of the yet accomplished avoided damages, of the avoided deaths, of the improved health et cetera.

According to the Climate Change Draft Scoping Plan, Table 1, page 8, by applying to 10 California refineries even the bare carbon dioxide reduction carried out by this measure technology for the report 180,000 b/cd case study refinery, hence by neglecting the reduction of the other greenhouse gases the technology obtains, the measure accomplishes a CO2 emission reduction over the 2002-2004 average emission of  $3.95 / 469 = 0.84 \%$ .

Thank you.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/7-ab32.rar](http://www.arb.ca.gov/lists/sp-industry-ws/7-ab32.rar)

Original File Name: AB32.rar

Date and Time Comment Was Submitted: 2008-07-30 06:55:58

No Duplicates.

## **Comment 8 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Karen

Last Name: Merriam

Email Address: karen@karenmerriam.com

Affiliation:

Subject: Industrial ghg pollution

Comment:

\*Make polluters pay for their emissions of greenhouse gases, using the resulting revenues to promote clean energy and aid low-income consumers.

\*Limit sharply and verify any offsets.

\*Do not link our program to any states with weaker emission standards.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 09:25:35

No Duplicates.



**Comment 9 for Industry Comments for the GHG Scoping Plan (sp-industry-  
ws) - 1st Workshop.**

First Name: Antoine

Last Name: McGrath

Email Address: Antoine.Mcgrath@gmail.com

Affiliation:

Subject: Zero-Emission Vehicles (ZEVs) in the hundreds of thousands

Comment:

Mandate that auto companies produce hundreds of thousands of  
Zero-Emission Vehicles (ZEVs) by 2014.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 11:49:07

No Duplicates.

## **Comment 10 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Shellee

Last Name: Davis

Email Address: colville@sonic.net

Affiliation:

Subject: Make polluters pay for their emissions

Comment:

Thank you for your work on the Draft AB32 Scoping Plan to reduce California's GHGs by 2020, especially in setting goals for the State to increase renewable energy and reduce vehicle miles travelled.

Please consider these recommendations for inclusion in the Final Scoping Plan:

- The State should auction 100% of permits under the cap. Polluters should pay for their emissions, not be given free permits that subsidize coal and prolong the transition to cleaner energy.
- The Scoping Plan should specify that all auction revenues will be used to provide a Dividend to compensate consumers. With gasoline at \$4.50/gallon and rising electricity prices, helping consumers deal with fuel and electricity costs is the best use of auction revenues.
- I support CARB's proposal for Carbon Fees on fossil fuel companies to help fund CARB's implementation of AB32. Carbon Fees can also provide funding sources for clean technologies, green jobs, energy efficiency programs, and more.

Sincerely,  
Shellee Davis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 16:38:04

No Duplicates.

**Comment 11 for Industry Comments for the GHG Scoping Plan (sp-industry-  
ws) - 1st Workshop.**

First Name: Evy

Last Name: Justesen

Email Address: evyjust@gmail.com

Affiliation:

Subject: Industrial

Comment:

Make polluters pay for their emissions of greenhouse gases, using the resulting revenues to promote clean energy and aid low-income consumers. Limit sharply and verify any offsets. Do not link our program to any states with weaker emission standards

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 21:27:40

No Duplicates.

**Comment 12 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Darren

Last Name: Stroud

Email Address: darren.stroud@valero.com

Affiliation:

Subject: Draft AB 32 Scoping Plan

Comment:

Please find attached Valero Energy Corporation's comments on the Draft AB 32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/12-comments\\_on\\_draft\\_ab\\_32\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/12-comments_on_draft_ab_32_scoping_plan.pdf)

Original File Name: Comments on Draft AB 32 Scoping Plan.PDF

Date and Time Comment Was Submitted: 2008-08-01 09:01:34

No Duplicates.

**Comment 13 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Pamela

Last Name: Williams

Email Address: tescudero@calretailers.com

Affiliation:

Subject: Comments on AB 32 Draft Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/13-carbletter073108.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/13-carbletter073108.pdf)

Original File Name: CARBLetter073108.pdf

Date and Time Comment Was Submitted: 2008-08-01 11:44:22

No Duplicates.

**Comment 14 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Pamela

Last Name: Williams

Email Address: tescudero@calretailers.com

Affiliation:

Subject: Comments on AB 32 Draft Scoping Plan

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/14-carbletter073108.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/14-carbletter073108.pdf)

Original File Name: CARBLetter073108.pdf

Date and Time Comment Was Submitted: 2008-08-01 12:17:00

No Duplicates.

## **Comment 15 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals

Subject: Industry Sector Comments

Comment:

Excerpts from general comments letter regarding:

### 1) Energy Efficiency Audits

Air Products agrees that continued focus on energy efficiency is the GHG reduction strategy with the most positive economic impact.

In requiring energy efficiency audits, CARB should develop guidelines and allow those industries with the technical capability to perform self-audits. Regardless of who conducts such audits, CARB must ensure the protection of Confidential Business Information likely to be revealed through the audit process. CARB must also define the criteria for determining "cost effectiveness" when considering rule provisions or permit conditions to prescribe such measures, taking into account differences between industries and competitive conditions of individual facilities.

### 2) Sector-Based Measures for Refineries/Oil and Gas Production

Air Products supports efforts to provide regulatory incentives for achieving continued process efficiency in refinery operations. We encourage CARB to consider the impact third-party support facilities/processes contribute to overall refinery efficiency. Such efficiency improvements will also yield reductions in criteria pollutants in particularly challenged air sheds.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 15:58:38

No Duplicates.

## **Comment 16 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Lisa

Last Name: Hoyos

Email Address: lhoyos@citizen.org

Affiliation:

Subject: top emitters shouldn't be allowed to trade

Comment:

Top carbon emitting industrial sectors should not be allowed to participate in any trading system. At an EJ Advisory Committee hearing I attended, the position expressed to staff is that would be a problem from a community perspective if a refinery in Wilmington could buy credits from a facility out of state (or region) in order to avoid reducing carbon emissions. It would also thwart the efforts to get cobenefit reductions in other harmful pollutants. Further, most of the data on the effectiveness on cap and trade programs does not bode well for their replication. We are behing the eight-ball on climate change and are already seeing its harmful manifestations. We cannot afford to gamble on a cap and trade program especially when it comes to the largest emitters. A cap and fee program would be better and wouldn't stifle innovation by allowing top emitters to buy their way out of the program for several years to come. There isn't room for error on this front. The emitters who are resisting cap and fee are those who resisted passing AB 32 to begin with. They need to be regulated strictly, without wiggle room. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 19:20:31

No Duplicates.



## **Comment 17 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Joyce M

Last Name: Eden

Email Address: comment@sonic.net

Affiliation:

Subject: Greenhouse Gas Sector 6. Industry

Comment:

GHG 6. Industry

Cement and AB 32 Scoping Comments

West Valley Citizens Air Watch Comments:

a. Reduction of Green House Gases (GHG) need to be linked in tandem to reductions in toxic air contaminants (TAC) and other harmful air pollutants. We ask that California Air Resources Board (CARB) remain clear at all times not to trade off one for the other. While in many cases, reduction in one category will achieve reduction in the other, this is not so across the board.

b. Cement plants are major CO2 generators. They emit a double dose of CO2 into the atmosphere: one huge dose from the high amounts of predominantly fossil and other fuels they burn to heat the kilns to approximately 3000° F; and the other huge dose from the Carbon which is released from heating the limestone. The released carbon combines with oxygen in the atmosphere producing CO2.

It is estimated that worldwide around 3-6% of human made CO2 emissions come from this single stationary source -- cement plants. From the Appendices, page C-104, "total emissions associated with cement used in the State (in 2006), 40 percent of which is imported, were estimated to be 15.3 [Million Metric Tons CO2] MMTCO2E."

Cement plants are also the largest source of air emissions of mercury in the state. "Hanson Permanente Cement in Cupertino. The plant, which released about 500 pounds of mercury compounds in 2006, is listed in the [Environmental Protection Agency (EPA)] report the third-worst kiln in the country"

[http://www.sfgate.com/cgi-](http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2008/07/24/BA4511U0D7.DTL&hw=cupertino+cement&sn=001&sc=1000)

[bin/article.cgi?f=/c/a/2008/07/24/BA4511U0D7.DTL&hw=cupertino+cement&sn=001&sc=1000](http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2008/07/24/BA4511U0D7.DTL&hw=cupertino+cement&sn=001&sc=1000)

Both CO2 and the mercury, as well as the other dangerous emissions, need to be greatly and quickly reduced. This can be done.

The Hanson Cement plant is owned by Heidelberg Cement which generated billions of dollars in profit last year. It is way past time for adequate pollution controls. Cement plants have gotten a pass on any reasonable amount of pollution controls for scores of years.

Meanwhile, the Hanson plant alone emits approximately 1.6 million metric tons of CO2 into the atmosphere yearly (based on their permitted production of 1.6 million tons of clinker per year for cement production) as well as mercury, dioxin, hexavalent chromium, tons of small particulates and other highly toxic air contaminants.

c. WVCaw recently learned, despite no public notice by the Bay Area Air Quality Management District, that the Hanson Cement Plant had switched from burning mainly coal to petroleum coke in May, 2007. According to CARB's CO2 chart in the handout entitled, "Stationary Combustion Default Emission Factors: Cement Plants in California Handout for Cement Technical Team Discussion: May 9, 2007," petroleum coke emits even more CO2 than coal (and apparently more mercury also). Thus the BAAQMD has recently allowed the Hanson Cement plant to increase its CO2 emissions!

d. Natural Gas: In the short term, many if not most of the cement plants in California could substitute natural gas for the much higher CO2 and toxic air contaminant producing fossil fuels such as coal and petroleum coke.

In a meeting with the BAAQMD and in subsequent written correspondence, the BAAQMD confirmed to WVCaw that Hanson Cement is equipped today to switch immediately from using petroleum coke to natural gas. It already has all the natural gas lines in place in the kiln and in fact currently uses a small amount of natural gas. This would greatly reduce in the short term both the CO2 emissions (see CARB CO2 chart) and the toxic air contaminants and small particulates.

e. If the cement is later blended with supplementary cementitious material (SCMs) then there will be no decrease in GHG, only an increase in the amount of cement produced. In order for CARB to decrease GHG releases, it is imperative that cement production not be allowed to increase (including imports).

f. Even if the carbon intensity factor (CIF) for cement decreases overall due to transportation, it will not help if cement production increases. Increased demand for this type of product is likely given increases in population estimates for 2020.

"ARB has not quantified these (cement) exports." (p C-104)  
ARB must quantify exports of California produced cement to better understand how exported California cement increases greenhouse gas emissions. It is counterproductive to export California produced cement to far away places such as Guam and then have Asian cement imported to California. In order "to minimize leakage" it is crucial that exports of California cement be quantified and accounted for.

<http://jgpo-guam-cmtf.blogspot.com/2008/06/port-authority-finalizes-deal-with.html>

The Hanson Cement Plant has said that they will import limestone when they run out at their operation. Yet there are no other significant reserves of limestone near Cupertino. When calculating the carbon intensity factor, transportation of limestone must also be included.

g. Fly ash and slag are not produced in California and

emissions from transporting these materials need to be quantified. Fly ash is a product of coal combustion. Coal combustion should not be promoted if we want to decrease greenhouse gas (GHG) emissions. It should begin to be decreased.  
[http://www.redorbit.com/news/science/1086106/utility\\_fined\\_over\\_fly\\_ash\\_constellation\\_energy\\_arundel\\_dump\\_owner/index.html](http://www.redorbit.com/news/science/1086106/utility_fined_over_fly_ash_constellation_energy_arundel_dump_owner/index.html)

Fly ash is also highly toxic. It has high concentrations of heavy metals. Also see below.

h. Solutions and Alternatives. It is therefore imperative that CARB fund the study of alternative processes for producing cement and alternative materials to substitute for concrete.

1) Alternative Process: Many of us have walked or driven on two millennia old Roman Roads in Europe. How was the cement & concrete produced that made these roads and buildings that still exist two thousand years later? Think Mt. Vesuvius. Think volcanic ash. The volcano heated the ash to thousands of degrees just as the cement kilns do to limestone today.

The Romans used this ready made volcanic clinker to make cement which they then made into their concrete. Instead of having to blast into the Earth with huge mining operations for limestone, it appears the Romans used the ready made volcanic clinker -- known today as volcanic pozzolans.

The Western Climate Initiative (WCI) is a perfect place to partner on this. Remember Mt. St. Helens in Washington State? There is a gigantic mountain of volcanic pozzolans just waiting to be tested to be used as clinker to make cement! No burning necessary. No fossil fuel necessary. The clinker is already heated and burned by Mt. St. Helens and ready to be ground into the appropriate size for clinker.

True, there would be transportation costs -- but that would pale in comparison to the 20 tons per hour! of petroleum coke (which is also transported) now used by Hanson cement to heat up the kiln to produce limestone clinker 24 hours a day, 7 days a week and -- except for 2 or 3 weeks down time -- all year round.

On the other hand, the use of volcanic pozzolans instead means no CO2 production through elimination of the need to heat limestone to high temperatures; thus eliminating air toxins and CO2 and other GHG emissions.

According to the article cited below, it appears that volcanic silica could be used instead of fly ash. We certainly do not want to burn coal in order to get fly ash after all.

A better understanding of "Roman concrete" might help significantly reduce GHG emissions by perhaps completely eliminating the need to heat up kilns. We urge you to read this paper which also discusses recent applications:

<http://www.romanconcrete.com/docs/spillway/spillway.htm>

It appears that volcanic ash as clinker might be all that is needed as the major component to produce cement in a new (and perhaps also ancient) process eliminating the huge amounts of energy to produce heated limestone clinker and eliminating the huge amounts of CO2 and toxic air contaminants!

Right there approximately 15 MMT of CO2 in California and 3-6% of worldwide CO2 production would be reduced in one fell swoop along with the horrible consequences of asthma, cancer, and other diseases caused by the current methods of cement production.

2) Alternative materials: Just to mention a couple. There is a multimillion dollar mansion just north of silicon valley built of straw bale. This is upscale recycling. It is easy to build with, highly insulating, safe, sound and dry when covered with plaster and of course roofing and stabilized with rebar or other methods and esthetically pleasing -- impossible to tell it is made with straw bale. This can also be seen at Real Goods in Hopland, CA, and many other locations in CA.

There is also an upsurge in building with cob. Actually a traditional method of building in Europe where there are centuries old multiple storied buildings still occupied in Germany, for example. Again, one would not know what material they were made of unless told. Examples of both straw bale and cob buildings can be seen at Hidden Villa Ranch in Los Altos, CA, which is open to the public for tours.

Concrete is used in many applications where its structural value is not needed, for example in non-weight bearing fencing. Other materials much less CO2 and polluting intensive can and should be used. Building codes should not allow concrete made from kilns to be used for such non-weight bearing uses.

i. West Valley Citizens Air Watch asks to be included as a Stakeholder for purposes of AB 32 regulation development and related regulations and issues. We ask to be included in any meetings, discussions, rule making and regulation development regarding cement kilns, cement production, uses of concrete and alternatives to limestone clinker, cement, and concrete.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 12:07:59

No Duplicates.

## **Comment 18 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Norman  
Last Name: Plotkin  
Email Address: norm@pzallc.com  
Affiliation: CIPA

Subject: Gas Subsector of the Industry Sector  
Comment:

The following comments were received by OCC on August 4th

Please find attached comments of the California Independent Petroleum Association (CIPA) regarding both the Draft Scoping Plan/Appendices and Oil and Gas Subsector of the Industry Sector. CIPA appreciates the opportunity to submit these comments and is happy to address any questions.

Norman Plotkin  
Plotkin Zins & Associates  
925 L Street, Suite 1490  
Sacramento, CA 95814  
916.446.5900  
916.781.3903

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/20-cipa\\_comments\\_to\\_carb\\_on\\_draft\\_scoping\\_plan\\_8-4-08.doc](http://www.arb.ca.gov/lists/sp-industry-ws/20-cipa_comments_to_carb_on_draft_scoping_plan_8-4-08.doc)

Original File Name: CIPA Comments to CARB on Draft Scoping Plan 8-4-08.doc

Date and Time Comment Was Submitted: 2008-08-07 13:58:05

No Duplicates.

## **Comment 19 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Patrick

Last Name: Griffith

Email Address: pgriffith@lacsds.org

Affiliation: Los Angeles County Sanitation Districts

Subject: LACSD Comments on the ARB Draft Scoping Plan: Industry Strategies  
Comment:

LACSD offers the following comments on the discussion concerning  
Industry Strategies in the Draft Scoping Plan:

1. Page C-102: We question the value of energy efficiency and co-benefits audits for large industrial sources. As stated previously, given control measure MCS-01 in SCAQMD's 2007 AQMP, most stationary combustion sources in the South Coast will be forced to BACT levels so there will be little margin left for improvement. To conduct an audit specifically to find co-benefits is not appropriate as the focus of AB 32 is greenhouse gas reduction.

2. Page C-115: In the South Coast, boiler efficiency may actually drop and GHGs increase as result of control measure MCS-01 which, in driving boiler NOx lower, is also lowering boiler efficiency thereby increasing the amount of fuel that needs to be burned to deliver the same usable output. See the Environmental Assessment for Rule 1146. The goal of increasing boiler efficiency and thereby reducing GHG emissions is thwarted by AQMPs that are solely focused on criteria pollutant reduction. CARB needs to be the arbitrator in these situations.

23. Page C-116: In the South Coast, it is difficult to install stationary internal combustion engines as prime power. We are also concerned about across the board electrification of motors as this reduces the region's ability to respond to emergencies such as earthquakes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-11 14:34:12

No Duplicates.

**Comment 20 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Diane

Last Name: Bailey

Email Address: [dbailey@nrdc.org](mailto:dbailey@nrdc.org)

Affiliation: NRDC

Subject: NRDC Comments on Industry in Draft Scoping Plan and Appendices

Comment:

NRDC respectfully submits these comments on Industry in the Draft Scoping Plan and appendices.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/22-nrdc\\_comments\\_on\\_industry\\_in\\_draft\\_scoping\\_plan\\_and\\_appendices.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/22-nrdc_comments_on_industry_in_draft_scoping_plan_and_appendices.pdf)

Original File Name: NRDC Comments on Industry in Draft Scoping Plan and Appendices.pdf

Date and Time Comment Was Submitted: 2008-08-11 14:46:40

No Duplicates.

**Comment 21 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Evelyn

Last Name: Kahl

Email Address: ek@a-klaw.com

Affiliation: CAC/EPUC

Subject: CAC/EPUC Comments on Draft Scoping Plan & Appendices

Comment:

Attached are the comments of the Cogeneration Association of California and the Energy Producers & Users Coalition on the Draft Scoping Plan and Appendices.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/23-cac.epuc\\_comments.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/23-cac.epuc_comments.pdf)

Original File Name: CAC.EPUC Comments.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:42:26

No Duplicates.



**Comment 22 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Fraust

Email Address: cfraust@sia-online.org

Affiliation: Director, ESH

Subject: Comments to the draft proposed AB 32 Scoping Plan

Comment:

Attached are SIA's comments to the draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/24-comments\\_to\\_draft\\_scoping\\_planrev2.doc](http://www.arb.ca.gov/lists/sp-industry-ws/24-comments_to_draft_scoping_planrev2.doc)

Original File Name: comments to draft scoping planrev2.DOC

Date and Time Comment Was Submitted: 2008-08-11 15:54:45

No Duplicates.

**Comment 23 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Brett

Last Name: Guge

Email Address: bguge@californiasteel.com

Affiliation: California Steel Industries, Inc.

Subject: Comments on AB 32 Scoping Plan and Appendices

Comment:

Please find comments attached on behalf of California Steel Industries, Inc.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/25-ab\\_32\\_scoping\\_comments\\_final.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/25-ab_32_scoping_comments_final.pdf)

Original File Name: AB 32 Scoping Comments final.pdf

Date and Time Comment Was Submitted: 2008-08-11 16:25:08

No Duplicates.

**Comment 24 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Edward

Last Name: O'Neill

Email Address: edwardoneill@dwt.com

Affiliation: California Large Energy Consumers Assoc

Subject: Comments on AB 32 Draft Scoping Plan & Appendices

Comment:

Attached are the Comments of the California Large Energy Consumers Association (CLECA) on the California Air Resources Board's AB 32 Draft Scoping Plan and Appendices. CLECA's Comments pertain to issues regarding the Industrial Sector and Electricity Sectors.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/26-cleca\\_-\\_rev.\\_ltr\\_to\\_carb\\_with\\_comments\\_on\\_draft\\_scoping\\_plan\\_and\\_appendices.doc.rtf](http://www.arb.ca.gov/lists/sp-industry-ws/26-cleca_-_rev._ltr_to_carb_with_comments_on_draft_scoping_plan_and_appendices.doc.rtf)

Original File Name: CLECA - Rev. Ltr to CARB with Comments on Draft Scoping Plan and Appendices.DOC.rtf

Date and Time Comment Was Submitted: 2008-08-11 17:13:03

No Duplicates.

**Comment 25 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Derek

Last Name: Walker

Email Address: dbwalker@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF - Industry comments

Comment:

Please accept the attached industry comments from Environmental Defense Fund on the AB 32 draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/27-edf\\_-\\_industry\\_comments.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/27-edf_-_industry_comments.pdf)

Original File Name: EDF - Industry comments.pdf

Date and Time Comment Was Submitted: 2008-08-12 15:22:49

No Duplicates.

**Comment 26 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: George

Last Name: Peridas

Email Address: gperidas@nrdc.org

Affiliation: NRDC

Subject: NRDC Comments on Industry - Addendum

Comment:

Please accept this addendum to our previously submitted comments on industry.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/28-nrdc\\_comments\\_on\\_industry\\_-\\_addendum.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/28-nrdc_comments_on_industry_-_addendum.pdf)

Original File Name: NRDC Comments on Industry - Addendum.pdf

Date and Time Comment Was Submitted: 2008-08-20 16:27:50

No Duplicates.

**Comment 27 for Industry Comments for the GHG Scoping Plan (sp-industry-ws) - 1st Workshop.**

First Name: Adam

Last Name: Harper

Email Address: [aharper@calcima.org](mailto:aharper@calcima.org)

Affiliation: CalCIMA

Subject: CalCIMA Scoping Plan Comments - Industrial

Comment:

Attached please find our comments on the industrial section of the Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-industry-ws/30-calcima\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-industry-ws/30-calcima_scoping_plan_comments.pdf)

Original File Name: CalCIMA Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-09-30 12:11:03

No Duplicates.

## **Comment 28 for Industry Comments for the GHG Scoping Plan (sp-industry- ws) - 1st Workshop.**

First Name: Charles

Last Name: W

Email Address: wellington3rd@gmail.com

Affiliation:

Subject: What right do you have to do anything!

Comment:

The public needs to know how you came into existence. Was you voted in, was you elected in, was you promoted in, what created this bureaucracy? We the public need to know how we can regulate you, because obviously you work for us, but interestingly enough the intellectual thought being promulgated on this issue at best is pre-school, which brings in great question of this leadership - true philosophical thought on ideals is beyond the range of the moment. As known now as a popular question to any candidate WHAT ARE YOUR QUALIFICATIONS? We need to know the destination of this rudderless ship. And not to some stated statics on a web site but to the true economic impact of their ideals of the greatest good to the greatest number. Quoted best by JOESPH STALIN

Your medical stats need reference to 5,10,20 year scientific studies for all to see and down load with your actual proof not just statements on ARB web site. We demand proof of your research!

Your moral responsibly, because you serve us is to inform the public about your actions, i.e. TV, RADIO, CABLE TV, SHORT WAVE RADIO to consciously inform the public about you unfettered action, and start spending our money responsible to serve your constituency.

It has to be known that you do not have unlimited power in the name of the people, but the people have the power over your little fiefdoms.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-06 20:07:53

No Duplicates.

**There are no comments posted to Industry Comments for the GHG Scoping Plan (sp-industry-ws) that were presented during the Workshop at this time.**